REMARKS

Claims 1-3. 5-7, 9-17, 19-21, 23-30, and 33-38 are pending and stand rejected. In this response, Claims 1, 7, 9, 10, 13-15, 21, 23, 24, 27, 28-30, 33, 37, and 38 have been amended, and Claims 8 and 22 been cancelled. Based on the amendments and the following remarks, the Applicants respectfully request that the Examiner withdraw the rejections and pass the application on to issuance.

Claim Rejections – 35 USC §103: The Examiner rejected Claims 1-3. 6-8, 11, 12, 15-17, 20-22, 25, and 26 under §103 as being unpatentable over USPN 6,092,078 issued to Adolfsson in view of USPN 6,154,843 issued to Hart. To establish a prima facie case of obviousness, the Examiner must show some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings; that there is a reasonable expectation of success; and that the prior art reference (or references when combined) teach or suggest **all** the claim limitations. MPEP § 2142.

As is made clear below, The Examiner has not established a prima facia case for obviousness as Adolfsson and Hart fail to teach one or more elements of each of Claims 1-3. 6-8, 11, 12, 15-17, 20-22, 25, and 26.

Adolfsson, as suggested by its title, discloses a method for interfacing a network peripheral with a browser. These network peripherals are referred to as "real word I/O devices" 3102 (Adolfsson, col. 3, lines 28-30) and as "data providing means" 3204-3210 (Adolfsson , col. 5, lines 24-26). Examples of a data providing means provided in Figs. 3 and 4 include temperature sensor 3204, temperature set point 3206, and outdoor camera 3208. For a "data providing means 3102" that is controllable, Adolfsson describes including "control means" in a web page where the "control means can be arranged for adjustment by clicking, dragging or typing control parameter." Adolfsson, col. 3, lines 28-32.

Hart discloses a system for secure remote computer access. The following summary is taken from Hart, col. 5, line 26 through col. 7, line 7. Hart teaches that a remote computer is used to establish communication with a local computing device of a private network. The remote computer is presented with a web page with a supported list of network administrative tasks selected based on a user's credentials presented through the remote computer – the list includes the administrative tasks that the particular user could perform if

the user were directly accessing the local network. Through that web page, the user selects a task. In response the local computer generates a custom program based on the selected task. The custom program includes a web page and network specific data needed to supply the user with the interface tools and network specific information unique to the private network. Further, the custom program is limited to the scope of the requested task. The custom program is provided to the remote computer. Using the custom program at the remote computer, parameters for executing the requested task are returned to the local computer. Using those returned parameters, the local computer executes the task.

Claims 1 and 15: Claim 1 is directed to a method for mediating access to production options and (as amended) recites the following acts.

1. acquiring a user's access request for a production device;
2. accessing data representing production options to which the user does and/or does not have permission to access, each production option corresponding to feature that when implemented affects a manner in which the production device produces a target document;
3. in response to the user's access request, dynamically generating a user interface according to the accessed data so that the user interface provides user accessible controls for only those options for which the user has permission to access; and
4. presenting the user with the generated user interface so that through the user interface the user can cause the production of the target document by the production device in accordance with a selection of one or more of the user accessible controls provided by the user interface.

Claim 15 is directed to a computer program product that includes a computer useable medium having computer readable instructions for performing the elements listed above.

As noted above, Adolfsson discloses an interface that includes "control means" for manipulating a control parameter for a "data providing means." Hart discloses presenting two web pages to a remote computer. The first includes a list of tasks based on a user's credentials. The second (the custom program) allows the user of a remote computer to supply parameters to allow a local computer to execute a specified task.

Adolfsson and Hart, individually and combined, fail to teach or suggest a method that includes accessing data representing production options to which the user does and/or does not have permission to access where each production option corresponds to a feature that when implemented affects a manner in which the production device produces a target document. Neither reference even hints at accessing data that is related to the production of a target document by a production device.

Adolfsson and Hart, individually and combined, fail to teach or suggest a method that includes generating a user interface according to the data representing the production options so that the user interface provides user accessible controls for only those options for which the user has permission to access. And more specifically the references fail to teach or suggest generating such an interface where those production options correspond to features that when implemented affect the manner in which the production device produces target documents. Neither reference even hints at generating an interface having user accessible controls that when selected affect the manner in which a production device produces a target document.

Furthermore, Adolfsson and Hart, individually and combined, fail to teach or suggest a method that includes presenting the user with the generated user interface so that through the user interface the user can cause the production of the target document by the production device in accordance with a selection of one or more of the user accessible controls provided by the user interface.

For at least these reasons Claims 1 and 15 are patentable over Adolfsson and Hart. Claims 2, 3, 5-12 and Claims 16, 17, 19-26 are also felt to distinguish over the cited references based at least on their dependence from Claims 1 and 15 respectively.

Claims 7 and 21: Claim 7, depends from Claim 1 and recites that the act of dynamically generating comprises:

1. retrieving an interface for the production device, the interface having user accessible controls for selecting production options for the production device; and
2. modifying the interface according to the accessed data providing user accessible controls for only those options for which the user has permission to access.

In short, Claim 7 recites the retrieval of an existing interface which is then modified according to data representing production options available to a particular user. Claim 21 depends from Claim 15 and recites similar elements.

Rejecting Claims 7 and 21, the Examiner asserts that Hart, col. 6, lines 12-34 teach modifying a retrieved interface. That passage from Hart is reproduced below:

> At step 232, the local computing device 130 generates a custom network page that includes custom programs unique to the task requested by the remote user in response to the command request made in step 230. The customized program may include, but is not limited to, data specific to the private network 140, a custom user interface specific to the type of command access requested, and custom program code specifically designed to support information gathering from the remote user and to support executing the requested command or commands on the private network 140 by way of local computing device 130. In the preferred embodiment, the custom programs include a customized Web page that is HTML compatible and that contains custom Web page type interface support and network specific data necessary to supply the remote network administrator with the interface tools and network specific information that are unique to the private network 140. Further, the custom Web page and custom programs are expressly limited to the scope of the requested task that the remote user is authorized to perform. The data specific to the private network 140 may include network configuration details, network administration parameters, and/or machine or node specific information such as passwords or network address information.

A cursory review of this passage reveals that Hart teaches generating a custom network page. However, Hart does not teach the modification of an existing interface as required by Claims 7 and 21.

For at least these additional reasons, Claims 7 and 21 are patentable over the cited references.

Claims 8-12 and 22-26: Claims 8-12 depend at least indirectly from Claim 7 which depends from Claim 1. Claims 22-26 depend at least indirectly from Claim 21 which depends from Claim 15. Claims 8-12 and Claims 22-26 are patentable over the cited references based at least on their dependency from patentable claims.

Claim Rejections – 35 USC §103: The Examiner rejected Claims 5, 9, 10, 19, 23, 24, 29, and 30 under §103 as being unpatentable over USPN 6,092,078 issued to Adolfsson

in view of USPN 6,154,843 issued to Hart in further view of USPN 6,751,657 issued to Zothner. As is made clear below, The Examiner has not established a prima facia case for obviousness as Adolfsson, Hart, and Zothner fail to teach one or more elements of each of Claims 5, 9, 10, 19, 23, 24, 29, and 30.

Claims 5, 9, and 10 each depend from Claim 1 and are patentable over the cited references based at least on their dependence from Claim 1.

Claims 19, 23, and 24 each depend from Claim 15 and are patentable over the cited references based at least on their dependence from Claim 15.

Claim 29 is directed to a system for managing electronic document production, and, as amended, recites the following elements.

1. a production server operable to dynamically generate an interface according to a user's record containing data representing production options to which the user does and/or does not have permission to access, each production option corresponding to feature that when implemented affects a manner in which the production device produces a target document;

2. a permission service in operable to acquire a client's access request for the production device and in response to direct the production server to generate an interface according to the user's record so that the user interface provides user accessible controls for only those options for which the user has permission to access, and to direct to the client the generated interface so that through the interface the user can cause the production of the target document by the selected production device in accordance with a selection of one or more of the user accessible controls provided by the modified interface.

As clarified above with respect to Claim 1, Adolfsson and Hart fail to teach or suggest a method that includes dynamically generating an interface according to a user's record containing data representing production options to which the user does and/or does not have permission to access where each production option corresponds to a feature that when

implemented affects a manner in which the production device produces a target document. It was also clarified that those same references failed to teach a method that includes directing to the client the generated interface so that through the interface the user can cause the production of the target document by the selected production device in accordance with a selection of one or more of the user accessible controls provided by the modified interface. As a consequence, those same references fail to teach system components for performing these method acts as recited by Claim 29.

Zothner fails to remedy the deficiencies of Adolfsson and Hart. Zothner discloses a method for associating "business rules with actions in terms of the role of a user in the system." Those actions are defined as the selective provision of notifications to one or more users based on the users' pre-defined role within the system. See, e.g., Zothner, Abstract. Zothner provides the following example:

> The NCMS 101 permits notifications to be mapped to the user role 779, such that a user 771 receives only those notifications that are assigned to a particular role. For example, if a user 771 is an engineer, the user 771 can only receive notifications that have been reserved to engineers (e.g., network alarms). The user roles 779 can be altered dynamically; for instance, the engineer's role can be elevated to a manager on a temporary basis. Accordingly, higher level notifications that were previously restricted from the user 771 as an engineer can now be received by the user 771 in the manager role.

Zothner, col. 19, lines 15-24. Notifications are defined as information sent to a recipient. That information pertains to a "business rule trigger." Upon the occurrence of a trigger a corresponding notification is sent to one or more users having a particular role corresponding to the trigger. Zothner, col. 4, lines 42-55. A notification manager 215 is responsible for sending notifications via e-mail, paging, and faxing. Zothner, col. 9, lines 47-48.

Zothner neither mentions nor suggests system components capable of generating and providing an interface in the manner required by Claim 29.

For at least these reasons, Claim 29 and Claim 30 which depends from Claim 29 are patentable over the cited references.

Claim Rejections – 35 USC §103: The Examiner rejected Claims 13, 14, 27, 28, and 33, 37, and 38 under §103 as being unpatentable over USPN 6,092,078 issued to Adolfsson in view of USPN 6,751,657 issued to Zothner. As is made clear below, The

Examiner has not established a prima facia case for obviousness as Adolfsson and Zothner fail to teach one or more elements of each of Claims 13, 14, 27, 28, and 33-38.

Claims 13 and 27: Claim 13 is directed to a method for mediating access to production options and, as amended, recites the following acts.

1. acquiring a user's access request for a production device;

2. accessing a record established for the user, the record containing data representing the production options for the production device to which the user does and/or does not have permission to access, each production option corresponding to feature that when implemented affects a manner in which the production device produces a target document;

3. generating a web page for the production device according to the user's record so that the user interface provides user accessible controls for only those options for which the user has permission to access; and

4. presenting the user with the generated web page so that through the web page the user can cause the production of the target document by the production device in accordance with a selection of one or more of the user accessible controls provided by the user interface.

Claim 27 is directed to a computer program product that includes a computer useable medium having computer readable instructions for performing the elements listed above.

As made clear above with respect to Claims 1 and 15, Adolfsson does not teach or suggest accessing a record or other data representing the production options for the production device to which the user does and/or does not have permission to access where each production option corresponds to a feature that when implemented affects a manner in which a production device produces a target document. Adolfsson mentions nothing of the production of a target document let alone accessing data that is in any way related to affecting the manner in which a production device produces a target document. Zothner fails to remedy Adolfsson's deficiencies as it simply teaches the selective sending of notifications based on user profiles.

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Furthermore, Adolfsson fails to teach or suggest presenting a web page that has been generated for the production device according to the user's record so that the user interface provides user accessible controls for only those options for which the user has permission to access and thus allowing a user to cause the production of the target document by the production device in accordance with a selection of one or more of the user accessible controls provided by the user interface. Again, Zothner fails to remedy Adolfsson's deficiencies as it simply teaches the selective sending of notifications based on user profiles.

For at least these reasons Claims 13 and 27 are felt to distinguish over the cited references.

Claims 14 and 28: Claim 14 is directed to a method for mediating access to production options and includes the following combination of elements.

1. acquiring a user's access request for a production device;
2. retrieving a web page for the production device, the web page having user accessible controls for selecting production options;
3. accessing a record established for the user, the record containing data representing the production options for the production device to which the user does and/or does not have permission to access, each production option corresponding to feature that when implemented affects a manner in which the production device produces a target document; and
4. altering the web page according to the user's record so that the web page provides user accessible controls for only those options for which the user has permission to access; and
5. presenting the user with the modified web page so that through the web page the user can cause the production of the target document by the production device in accordance with a selection of one or more of the user accessible controls provided by the user interface.

Claim 28 is directed to a computer program product that includes a computer useable medium having computer readable instructions for performing the elements listed above.

As made clear above with respect to Claims 1 and 15, Adolfsson does not teach or suggest accessing a record or other data representing the production options for the production device to which the user does and/or does not have permission to access where each production option corresponds to a feature that when implemented affects a manner in which a production device produces a target document. Adolfsson mentions nothing of the production of a target document let alone accessing data that is in any way related to affecting the manner in which a production device produces a target document. Zothner fails to remedy Adolfsson's deficiencies as it simply teaches the selective sending of notifications based on user profiles.

As made clear above with respect to Claim 7, Adolfsson does not teach or suggest presenting a web page that has been retrieved and then altered according to the user's record so that the web page provides user accessible controls for only those options for which the user has permission to access and thus allowing a user to cause the production of the target document by the production device in accordance with a selection of one or more of the user accessible controls provided by the user interface. Zothner fails to remedy Adolfsson's deficiencies as it simply teaches the selective sending of notifications based on user profiles.

For at least these reasons Claims 14 and 28 are patentable over the cited references.

Claim 33: Claim 33 is directed to a system for managing electronic document production and, as amended, recites the following elements:

1. a production server operable to serve to a client an interface having user accessible controls for selecting production options for a target document, each production option corresponding to feature that when implemented affects a manner in which a selected production device produces a target document;

2. a permission service operable to retrieve the interface from the production server for the selected production device, access a user's record containing data representing production options to which the user does and/or does not have permission to access, modify the interface according to the user's record so that the modified interface has user accessible controls for only those options for which the user has permission to access, and direct to the client the modified interface so that through

the interface the user can cause the production of the target document by the selected production device in accordance with a selection of one or more of the user accessible controls provided by the modified interface.

As clarified above with respect to Claim 7, Adolfsson fails to teach or suggest a method that includes presenting a web page that has been retrieved and then altered according to the user's record so that the web page provides user accessible controls for only those options for which the user has permission to access and thus allowing a user to cause the production of the target document by the production device in accordance with a selection of one or more of the user accessible controls provided by the user interface. Zothner fails to remedy Adolfsson's deficiencies as it simply teaches the selective sending of notifications based on user profiles. As a consequence, those same references fail to teach system components for performing these method acts as recited by Claim 33.

For at least these reasons Claim 33 is patentable over the cited references.

Claim 37: Claim 37 is directed to a system for a system for managing electronic document production and, as amended, recites the following elements.

1. a production device;
2. one or more user records, each user record containing data representing the production options to which the particular user does and/or does not have permission to access, each production option corresponding to feature that when implemented affects a manner in which the production device produces a target document;
3. a production server in communication with the production device and operable to generate an interface for that production device according to a user record so that the generated interface has user accessible controls for only those options for which the user has permission to access;
4. a permission service operable to access the user's record, direct the production server to generate an interface for the production device according to the user's record, and to direct to the a client the generated interface so that through the interface the user can cause the production of the target document by the selected

production device in accordance with a selection of one or more of the user accessible controls provided by the modified interface;

5. one or more device records, each device record containing data representing the production options offered by the production device;

6. a permission engine operable to parse the device records and generate an web page for managing user records;

7. a device locator operable to detect new production devices; and

8. an update service operable to create a device record for each newly detected production device.

As discussed above, Adolfsson and Zothner, even when combined, fail to disclose a record containing data representing the production options to which the particular user does and/or does not have permission to access where each production option corresponding to feature that when implemented affects a manner in which the production device produces a target document. Furthermore, the references fail to teach or suggest production server and a permission service that are operable to utilize such records in the specific manner recited by Claim 37.

For at least these reasons, Claim 37 is felt to distinguish over the cited references.

Claim 38: Claim 38 is directed to a system for managing electronic document production and includes the following combination of elements:

1. a production device;

2. one or more user records, each user record containing, for each production device, data representing the production options to which the particular user does and/or does not have permission to access, each production option corresponding to feature that when implemented affects a manner in which the production device produces a target document;

3. a production server in communication with the production device and operable to serve an interface for that production device, the interface having user accessible controls for selecting production options for the production device;
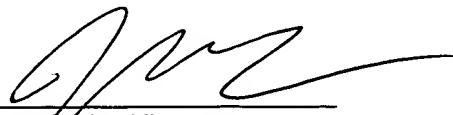
4. a permission service operable to access the user's record, retrieve the interface from the production server, modify the interface according to the user's record so that the modified interface has user accessible controls for only those options for which the user has permission to access, and to direct to a client the modified interface so that through the modified interface the user can cause the production of the target document by the selected production device in accordance with a selection of one or more of the user accessible controls provided by the modified interface;

5. one or more device records, each device record containing data representing the production options offered by the production device;

6. a permission engine operable to parse the device records and generate an web page for managing user records;

7. a device locator operable to detect new production devices; and

8. an update service operable to create a device record for each newly detected production device.

As discussed above, Adolfsson and Zothner, even when combined, fail to disclose a record containing data representing the production options to which the particular user does and/or does not have permission to access where each production option corresponding to feature that when implemented affects a manner in which the production device produces a target document. Furthermore, the references fail to teach or suggest production server and a permission service that are operable to utilize such records in the specific manner recited by Claim 38.

For at least these reasons, Claim 38 is felt to distinguish over the cited references.

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Conclusion: In view of the foregoing remarks, the Applicant respectfully submits that the pending claims are in condition for allowance. Consequently, early and favorable action allowing these claims and passing the application to issue is earnestly solicited. The foregoing is believed to be a complete response to the outstanding Office Action.

Respectfully submitted,

Shell Sterling Simpson, et al.

By _____

Jack H. McKinney

Reg. No. 45,685

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